

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA

In re:

CIRCUIT CITY STORES, INC.

Debtor.

Case No: 08-35653-KRH

**RESPONSE OF S.M. WILSON &  
COMPANY TO SEVENTIETH  
DEBTORS' OMNIBUS OBJECTION TO  
CLAIMS**

S. M. Wilson & Company ("SM Wilson"), by and through counsel, for its  
Response to Debtor's Seventieth Omnibus Objection to claims, including the claim of  
SM Wilson, states:

**Title of Debtor's Objection to Claim at Issue:**

Debtors' Seventieth Omnibus Objection to Claims: (docket No. 7013).

**Claimant's Name:** S.M. Wilson & Company

**Claim explanation:** Unpaid bills for construction at Harker Heights Project  
(Payment Application #6 dated November 5, 2008 in amount of \$56,297.71);

Unpaid bills for construction – Mansfield Project (Payment Application #4 dated  
October 15, 2008 in amount of \$119,965.90; Payment Application #5 dated December  
12, 2008 in amount of \$66,958.52).

**Person with Knowledge of facts:**

Mike Dohle  
S.M. Wilson & Company  
2185 Hampton Avenue  
St. Louis, MO 63139  
[Mike.dohle@smwilson.com](mailto:Mike.dohle@smwilson.com)  
314-645-9595 (Phone)  
314-645-1700 (Fax)

**Statement of Claim:**

S.M. Wilson performed services under contract dated March 3, 2008 (Harker Heights), as set forth in Payment Application No. 6 (referenced above); and under Contract dated March 3, 2008 (Mansfield), as set forth in Payment Application No. 6 (referenced above); and under contract dated March 3, 2008 (Mansfield) as set forth in payment application No. 4 and Payment Application No. 5 (each referenced above), none of which services were paid by Circuit City Stores, Inc.

**Claimant's Address, telephone number and fax number:** are set forth above.

**Attorneys address, telephone number and fax number:** are set forth below in signature block.

**Contact Information, Person with Authority to Settle:** Mike Dohle – see above and J. Talbot Sant, Jr. – see signature block below.

Dated: April 22, 2010

Respectfully submitted,  
SHULMAN, ROGERS, GANDAL,  
PORDY & ECKER, P.A.

By: /s/ Gregory D. Grant  
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